

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

SELENA Y. HANCOCK,

Appellant,

v.

**Case No.: 14-7015
(1:10-cv-0487-RLW)**

WASHINGTON HOSPITAL CENTER

Appellee.

**EMERGENCY MOTION TO STAY BRIEFING SCHEDULE AND TO
WITHDRAW APPEARANCE**

To protect Ms. Hancock's interests, undersigned counsel files the instant Emergency Motion to Stay the Briefing Schedule And to Withdraw Appearance as follows:

Appellant, Selena Y. Hancock, through undersigned counsel, initiated her appeal on February 6, 2014, alleging disability discrimination in violation of the Americans with Disabilities Act. Ms. Hancock was made aware, and agreed that she bore the financial responsibility of paying for all appellate costs, including the costs of printing the appellate briefs and appendix. Ms. Hancock agreed to remit advance payment as the printing company requires advance deposit before the appellate brief and appendix are finalized and filed.

Appellant's opening brief and completed appendix are due to be filed on May 27, 2014, and all documents for the appendix (likely two thousand pages) will need to be proofed and printed in advance of this date, all in compliance with this court's requirements. Undersigned counsel has been diligently preparing Ms. Hancock's opening brief to meet the Court's May 27, 2014, deadline. Undersigned counsel has further coordinated all appendix designations with opposing counsel. However, on Friday, May 16, 2014, Ms. Hancock notified undersigned counsel that she is unable to meet her financial responsibility of paying the costs of printing of the brief and appendix at this time. Undersigned counsel cannot advance six thousand dollars in costs to Ms. Hancock and she was advised that undersigned counsel will move to withdraw her appearance should she be unable to meet her financial responsibility.

For these reasons, undersigned counsel asks the Court to:

- (a) stay the briefing schedule for four months to allow Ms. Hancock to obtain the funds to pay for the costs of appeal; and
- (b) permit undersigned counsel to withdraw her appearance and allow Ms. Hancock time to secure new counsel.

Appellee, Washington Hospital Center will not be prejudiced by this motion as this case has not been scheduled for oral argument. Counsel for Washington

Hospital Center has been notified of this motion. Ms. Hancock has also been notified of same.

Respectfully submitted,

THE KHAN LAW GROUP, PLLC

Dated: May 19, 2014

By: /s/
Karen A. Khan No. 455297
2200 Pennsylvania Avenue, N.W.
Fourth Floor East
Washington, D.C. 20037
(202) 290-1670
kkhan@khanlawgroup.net

CERTIFICATE OF SERVICE

I hereby certify that the instant *Emergency Motion to Stay Briefing Schedule and to Withdraw Appearance* was served via the Court's ECF service and regular mail on this 19th day of May 2014, upon:

David Tobin, Esq.
TOBIN, O'CONNOR & EWING
5335 Wisconsin Avenue, N.W.
Suite 700
Washington, D.C. 20015

and

Selena Y. Hancock
6045 Surrey Square Lane
District Heights, MD 20747
By Priority Mail

 /s/
Karen A. Khan

